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As part of its employee recruitment process, including considering your application for employment, C40 Cities Climate Leadership Group Inc. (C40), a Delaware incorporated, non-stock, non-profit corporation whose registered office is at 120 Park Avenue, Floor 23, New York, NY, USA, needs to collect, store and process your personal information.

Please read the following carefully, before submitting your application, to understand how C40 treats your information when you apply for a position within our organisation.

Please note that this Notice is reviewed from time to time and the current version will be posted on this website.

**1. Who we are**

Depending on the C40 office you apply to, the following may also be controllers of your personal information and it may be shared between these offices to achieve the purposes set out below:

- If in the UK, C40 Cities Climate Leadership UK, a charity registered in England and Wales with company number 10401717 and charity number 1173124 whose registered office is at 3 Queen Victoria Street, London, EC4N 4TQ, UK.

- If in South Africa, C40 Cities Climate Leadership South Africa NPC, a Non Profit Company registered in South Africa with a company number of 2017/243962/08 whose registered office is at Traduna House, 118 Jorissen Street, Braamfontein, 2001 Gauteng, South Africa.
- If in Denmark, Foreningen C40 Cities Climate Leadership Denmark, an Association registered in Denmark with a CVR number of 40708243 whose registered office is at c/o BLOXHUB, Bryghuspladsen 8, 1473 Copenhagen K, Denmark.
- If in China, C40 Cities Climate Leadership Group (USA) Beijing Representative Office, a Representative Office registered in China with unified social credit code G1110000MCW1706939 whose registered office is at Room 101, 10th floor, 12# Diplomatic Residence Compound, No.1 Xiushui Street, Chaoyang District, Beijing, China.

Please note that, via a professional employment organization, such as SafeGuard World International (SGWI) or Shield GEO, in certain countries you may be employed by an 'in-country employer' which is a separate organization and will also be a data controller of your personal information. Your employment contract will make this clear. If you have any questions regarding this, please contact us.

## 2. **Personal information we collect**

Some examples of the types of personal information we process are:

- Name, date of birth and other identity information (including any in documentation to prove identity)
- address, telephone number, personal email address
- nationality / visa / right to work information
- employment history and references
- pre-employment screening information including criminal history information
- Any additional information provided to us directly by you throughout the application process

During the recruitment process, we also collect some sensitive personal information about you – for example disability information, so that we can make reasonable adjustments where necessary for you to apply for a role, including interview access – to ensure we comply with legal and regulatory

obligations applicable to our hiring and employment practices. We may also collect diversity information about your race or ethnicity, religious beliefs, health and/ or sexual orientation in order to ensure meaningful equal opportunity monitoring and reporting. We ensure that this information is not used to make individual decisions about your recruitment.

### 3. **How we use personal information**

We collect and use your personal information for the following purposes (where applicable to the circumstances of your application):

- To evaluate your application against the job listing and requirements and confirm your identity
- Determine if you will be chosen for an interview or appointment
- To manage and administer the recruitment and interview processes
- If selected to fill the position, to collect from you the necessary information to perform a background check, which includes a criminal check and verification of work history provided during the evaluation process
- To administer the onboarding process.
- To comply with legal and regulatory requirements, and/ or to prevent or detect fraud (including providing your information to law enforcement agencies).

Under applicable EU law, we are required to tell you our legal basis for processing your personal information. Our legal bases are generally:

- In some cases, on the basis of your explicit consent
- On the basis of our or your legitimate business interest in administering employment applications and recruitment (provided that interest is balanced against your rights and freedoms).
- To comply with legal and regulatory obligations.

### 4. **How we keep your personal information secure**

When we handle your personal information, we do so through secured systems that employ appropriate technical measures and in accordance to strict internal HR specific information handling procedures.

Access to Personal information collected is limited strictly to those who need to know to facilitate the recruitment process in accordance with this Privacy Notice.

### 5. **Sharing your personal information**

We may need to share your personal information internally within the C40 group (both in the country where you may work and in other countries in which we have central operations). In particular, our HR department is centralized in the UK.

Your personal information is shared with those whom facilitate the activities listed in this Privacy Notice. This includes a number of third-party services, such as IT service providers.

We only use such third-party services where they provide sufficient guarantees to safeguard your personal information. Where third-party services process your personal information, we put in place measures to ensure they do so only at C40's direction and pursuant to an appropriate contract, and via the use of adequate technical measures.

We may also need to share your personal information with certain external third parties including organisations that conduct background checks on our behalf, such as HireRight (<https://www.hireright.com/>), and where they provide a separate notice explaining this.

## **6. Overseas processing**

C40 is an international organization and, as such, may need to transfer your information outside of your country. Some of these recipients will be located outside of the European Economic Area. In these scenarios, your information will only be transferred provided we have taken all steps reasonably necessary to ensure it receives an adequate level of protection (such as by entering into standardized clauses approved by relevant authorities).

## **7. Retention Period**

If your application is un-successful, the personal information provided will generally be held for the period of 6 months (subject to applicable law) and then securely deleted.

If your application is successful, your personal information will be stored for at least the period of your employment with C40 and for at least the minimum period set by the statutory or regulatory requirements applicable to your information and employment records.

In general terms, C40's overarching approach is that where no statutory or regulatory requirements exists, your personal information will be kept for the minimum period necessary for C40 to fulfil the purpose for which it was

collected. If you have any questions about our retention policies, please contact us at [privacy@c40.org](mailto:privacy@c40.org) or write to us at ATTN: Legal Department, 120 Park Ave, Floor 23, New York, NY 10017.

## 8. **Your Rights**

You have the right to request from us access to and rectification (if it is incorrect) of your personal information.

Depending on where you are based or the office in which you are applying, you may also have the right to ask us to 'restrict' processing, object to processing in limited cases, as well as, in certain circumstances, the right to data portability or to erasure of your personal information. These are limited legal rights which may not apply in all circumstances.

If you have provided consent for the processing of your information you have the right (in certain circumstances) to withdraw that consent at any time which will not affect the lawfulness of the processing before your consent was withdrawn.

To exercise your rights, or for more information, please email [privacy@c40.org](mailto:privacy@c40.org). We may ask for further information from you or to verify your identity before we can comply with your requests.

If you are an individual subject to the EU General Data Protection Regulation (broadly, this may be where you are based in the EU or you are applying for a role in one of C40's offices based in the EU), you have the right to lodge a complaint to the Information Commissioners' Office (in the UK), or the Supervisory Authority in your country, if you believe that we have not complied with the requirements of the GDPR with regards to your personal information.

## 9. **How to access personal information or if you have any other questions**

To request a copy of the personal information we hold about you, or if you have any other questions about this policy and the ways we use your personal information, please email [privacy@c40.org](mailto:privacy@c40.org) or write to us at ATTN: Legal Department, 120 Park Ave, Floor 23, New York, NY 10017.